YPLSF
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United States Department of Agriculture
Agricultural Research Service
Pacific West Area
800 Buchanan Street
Albany, California
94710

April 6, 1992

Mr. Kevin Schanielec
U.S. Environmental Protection Agency Region X
Mail Stop HW 104
1200 Sixth Avenue
Seattle, Washington 98101

RE: USDA'S Response to 3/23/92 Comments from EPA

Dear Mr. Schanielec:

Per your request of March 23, for additional information regarding Closure of Pesticide Disopsal System at Yakima Agricultural Research Laboratory, I am enclosing the detailed response submitted by Hong West & Associates, of Lynwood, Washington.

One other question I failed to ask you: are you signing for both RCRA and CERCLA? If additional information is needed, don't hesitate to contact me.

Sincerely,

ALVIN HUMPHREY
Safety and Health Manager

Enclosure

cc:
Chester A. Reder, AAO, PWA
M. Wiggett, LAO, Yakima, WA
L. Countee, CAD, FD
G. Sundstrom, SHPS, fd

HONG WEST & ASSOCIATES

• Geotechnical Engineering • Hydrogeology • Materials Testing • Construction Inspection •

PROJECT MEMORANDUM

PROJECT: YARL

PROJECT NO. 90042

DATE: April 6, 1992

EPA-2

To: Alvin Humphrey, USDA
From: Doug Geller
Subject: USDA'S RESPONSE TO MARCH 23, 1992 COMMENTS FROM EPA

1. The question conerning the dieldrin action level of 44 ppb:

Response

The action levels as calculated under FR July 27, 1990 show a calculated value of 0.044 (Or 4.4E-02) mg/l or mg/kg (ppm) using the dieldrin CPF according to the FY-1991 Health Effects Assessment Summary Tables (OERR 9200.6-303;91-1). The proposed action level in the FR is a round off value and the third significant figure (.004) is simply not listed. The value we have used is the correct value as calculated by the appropriate guidance. However, it should be noted that the .042 ppm (42 ppb) value detected at YARL represents a single value, and that the statistical average of samples collected is considerably below even the rounded off value of .040 ppm.

2. Request for clarification of the hexachlorocyclohexane analysis and action levels:

Response

The cause of the confusion is the fact that many chemicals have more than one name.

Alpha - BHC and Beta - BHC are the two hexachlorocyclohexanes with action levels of 100 and 4000 ppb, respectively. Gamma - BHC is also known as lindane and has the 500 ppb action level. All of these compounds are hexachlorides with the empirical formula $C_6H_6Cl_6$. Clarifications may be made by cross-checking the CAS Registry Numbers contained in the laboratory reports. All three of these insecticides were analyzed for during the YARL closure process using the EPA method 8080, and all soil samples had concentrations below the practical quantitation limit (BQL).

☑ P.O. Box 596
Lynnwood, WA 98046
(206) 774-0106

☐ 157 Yesler Way
Suite 505, Seattle, WA 98104
(206) 622-7698

3. The disposition of the sink and associated piping that drained into the former septic system.

Response

The sink was removed about 1986, during a remodeling project at YARL. Prior to removal, the stainless steel sink was rinsed several times, and the rinsate drained into the former septic tank. The 2" drain pipe from the sink remains below ground surface. The septic system never backed up (which may have stressed the drain pipe and caused leaks). In addition, since the sink was thoroughly flushed prior to removal and disposal, no residues are likely to remain in the pipe. In summary, although technically the sink drain pipe is a portion of the former pesticide disposal system it is not a potential source of contamination.

4. The question concerning barrels of drill cuttings.

Response

These cuttings were not from the drainfield drilling, but rather from the original monitoring well installations (1988). They were re-profiled in 1991 and found to be nonhazardous and disposed of at a USDA-owned facility.